Clean Air Act Compliance Inspection Report

United States Environmental Protection Agency
Region 10 – Seattle, WA

Clean Air Act Full Compliance Evaluation Inspection Report

Timber Products Company Limited Partnership ("Timber Products")

Medford, OR 97501

Inspection Date: July 13 – 14, 2022

Steve Rapp

Digitally signed by Steve Rapp
Date: 2022.08.17 08:25:22 -04'00'

Report Author Signature Date

Steven Rapp
Senior Engineer
Eastern Research Group, Inc.

BRENDAN WHYTE

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Brendan Whyte
CAA/TRI Enforcement Officer
EPA Region 10

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Section Chief Signature Date

Derrick Terada
ATES Section Chief
EPA Region 10

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Attachments

1. Basic Facility and Inspection Information

Facility:	Timber Products Company 25 E. McAndrews Road Medford, OR 97501
Mailing Address:	Timber Products Company P.O. Box 1669 Medford, OR 97501
AFS/FRS Number:	OR0000004102900025
SIC:	2435 Hardwood Veneer and Plywood 2436 Softwood Veneer and Plywood 2492 Particleboard 2493 Reconstituted Wood Products
NAICS:	321211 Hardwood Veneer and Plywood Manufacturing 321212 Softwood Veneer and Plywood Manufacturing 321219 Reconstituted Wood Product Manufacturing
Permit Number:	15-0025-TV-0 I, dated June 23, 2022
Facility Contacts:	Bonnie Basden Senior Environmental Manager Timber Products bbasden@timberproducts.com Eric Feaster Mill Manager: Plywood Timber Products - Medford efeaster@timberproducts.com Dennis Tally Director of Manufacturing: Composites Timber Products - Medford dtally@timberproducts.com Dwayne Arino (by telephone) Environmental Health and Safety Director Timber Products darino@timberproducts.com

	Nick Brown Particleboard Manager Timber Products
	Mike Niedermeyer Safety Manager, Plywood Timber Products
	Adam Wasniewski Safety Manager, Particleboard Timber Products
U.S. EPA Inspectors:	Steve Rapp Eastern Research Group, Inc. (ERG) (339) 364-4264 Steve.rapp@erg.com
	Dan Roper ERG (703) 841-1704 Dan.roper@erg.com
Date of Inspection:	July 13 – 14, 2022
Inspection Start/End Times:	July 13, 2022, 1:00 pm – 4:00 pm July 14, 2022, 8:00 am – 1:00 pm
Inspection Notice:	This was an announced inspection. Notification was provided by Brendan Whyte, U.S. EPA, Region 10, by phone and e-mail on July 11, 2022.

This was a Clean Air Act ("CAA") compliance inspection by the Eastern Research Group, Inc. ("ERG") on behalf of the United States Environmental Protection Agency ("EPA"). Inspector Rapp, ERG, led the inspection. The Oregon Department of Environmental Quality ("ODEQ") was made aware of the inspection beforehand but declined to join. The purpose was to identify potential compliance concerns with CAA regulations, specifically to gather information in order to determine if the Timber Products facility in Medford, Oregon, ("Timber Products" or "the facility") is in compliance with its Title V permit, including NESHAP subparts DDDD and DDDDD.

Disclaimer

This report is a summary of observations and information gathered from the facility at the time of the inspection and from a subsequent records review. The information provided does not

constitute a final decision on compliance with CAA regulations or applicable permits, nor is it meant to be a comprehensive summary of all activities and processes conducted at the facility.

The following facility description is based on information provided by a facility representative in the opening conference as well as information found on-file regarding permits and prior inspections.

1. **Facility/Process Description:**

The facility manufactures two products, plywood from soft- and hardwood veneers, and particle board from softwood fibers.

For manufacturing particleboard, the facility receives approximately 20 to 30 truckloads per day of wood fiber ("furnish"). The furnish for particleboard is both green and dry wood shavings, sawdust, chips, and plywood trim. The purchased furnish for particleboard is screened, the oversized fraction being ground with four grinders or one hammermill. There are two particle dryers drying furnish to about 4-6% moisture and two veneer dryers for drying the green veneer to 6-15% moisture. The particle dryers burn natural gas and sander dust with propane backup.

Currently, while processing dry furnish, defined as furnish with a maximum inlet moisture content of less than or equal to 30 percent (by weight, dry basis), particulate matter ("PM") from the particle dryers is controlled by the wet electrostatic precipitator ("WESP"), which is the base case operating scenario in the permit. While processing "green furnish," defined as furnish with a maximum inlet moisture content of greater than 30 percent (by weight, dry basis), the particle dryers are required to be controlled by the WESP and a biofilter, which is alternate operating scenario 1 in the permit. The permit allows the facility to use the biofilter while operating in the base operating scenario but does not require it. PM from other parts of the particle board manufacturing process is controlled by cyclones and baghouses.

The ground dried portion is then rescreened or sent directly to the line separating the furnish into two size ranges, called "core" and "face" with face being the surface layer. Dried furnish is then blended with materials, such as resins, that bind it together prior to being formed on plates, heated, and pressed into particle board. The boards are further processed where they are sanded, optimized, and cut to final dimension before being stored and shipped.

Heat for the particleboard forming process is provided by the Particleboard Boiler ("PB Boiler"), a 25.1 million British thermal unit per hour ("MMBtu/hr."), Thermogenics Thermocoil Steam Boiler.

For manufacturing of plywood, the facility receives shipments of both dry hardwood veneers ("skins"), as well as both dry and green softwood veneers. The green veneers are dried in a natural gas fired jet veneer dryer. The veneers are separated by quality and size after drying and then taken to one of three hydraulic steam-heated presses where individual sheets are laid-up with resins. The plywood sheets are then cut to final dimension, repaired (if necessary), trimmed, sanded, graded, and stored for shipping.

Additionally, the facility has the capacity to use pieces of purchased plywood or particleboard (blanks) which can be laid-up with hardwood skins on the surface giving additional options for producing finish products.

Heat for the plywood pressing process is provided a by the Plywood Boiler ("PW Boiler"), a second 25.1 MMBtu/hr., Thermogenics Thermocoil Steam Boiler. PM and volatile organic compounds ("VOCs"), including hazardous air pollutants ("HAPs"), such as methanol and formaldehyde, from the veneer drying process are controlled by a regenerative thermal oxidizer ("RTO"). PM from the plywood manufacturing process is controlled by cyclones and baghouses. See Photograph 14 in the photo log.

2. Compliance History

Based on a review of the Detailed Facility Report in EPA's Enforcement and Compliance History Online ("ECHO"[1]) webpage, Oregon issued an Administrative Order that was entered on January 24, 2019. The State assessed a penalty of $14,423. Otherwise, there do not appear to be any formal or informal CAA enforcement actions at the facility over the past 12 calendar quarters.

3. Day 1 Inspection Elements/Order

a. Pre-Inspection Observations

The inspectors went directly to the facility. No observations were made prior to the scheduled inspection.

The following records were reviewed prior to the inspection:

- Oregon Title V Operating Permit, Permit number: 15-0025-TV-0 I, dated June 23, 2022;
- Oregon Title V Operating Permit, Permit number: 15-0025-TV-0 I, dated May 12, 2016;
- Title V Operating Permit Review Report for application number 32207;
- Title V Operating Permit Minor Permit Modification, dated August 5, 2019;
- Oregon Department of Environmental Quality Construction Air Contaminant Discharge Permit, dated June 21, 2021;
- Annual Title V Report, Permit No. 15-0025-TV-01, Reporting Period January 1, 2020, to December 31, 2020, dated March 10, 2021;
- Semiannual Title V Report, Permit No. 15-0025-TV-01, Reporting Period January 1, 2021, to June 30, 2021, dated June 26, 2021;
- Annual Title V Report, Permit No. 15-0025, for 2016, dated January 30, 2017, including the semi-annual certification and semi-annual MACT compliance reports;
- The 2016 Air Toxics Emissions Inventory for the facility;
- Particle Dryers, Particleboard Press, Biofilter Source Test Results from November 2008 to October 2014, date unknown; and

[1] See https://echo.epa.gov/

- Various administrative amendments to the permit between 2019 and 2021.

b. Entry and Opening Conference

Mr. Rapp and Mr. Roper ("the inspectors") arrived at the facility at approximately 1:00 pm on July 13, 2022. They first went to the delivery entrance of the production facility on Sage Boulevard but were directed to the administrative offices on East McAndrews Road. At the administrative building, they met with Bonnie Basden, Dwayne Arino (by phone), Eric Feaster, and Dennis Tally ("the facility representatives"). The inspectors presented inspection credentials (Mr. Roper) and identification card (Mr. Rapp) and explained that they were at the facility to conduct a CAA Title V permit inspection.

The inspectors explained that the inspection would consist generally of a facility walkthrough and review of records related to permit. They explained that they would like to take photographs of equipment that emitted air pollution, as well as control devices, during the walkthrough. Further, they explained that the facility could request that the photos and other information be treated as confidential business information ("CBI"), and that EPA would provide the facility with a copy of the photos as part of the inspection report.

They asked that several types of records be made available for review, including:

- Notification of Compliance Status ("NOCS") reports for the national emission standards for hazardous air pollutant ("NESHAP") standards at 40 C.F.R. Part 63 subpart DDDD, National Emission Standards for Hazardous Air Pollutants: Plywood and Composite Wood Products ("subpart DDDD"), and 40 C.F.R. Part 63 subpart DDDDD, National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters ("subpart DDDDD");
- Emissions test reports;
- Reports of visible emission tests;
- A list of equipment and maintenance records for equipment at the facility that contained more than 50 pounds of ozone depleting substances ("ODS"), such as refrigerants;
- Title V permit semi-annual deviation reports and annual compliance certifications for 2020 and 2021;
- Start-up shutdown, and malfunction plans for pollution control devices;
- Work orders for maintenance and repairs done on the pollution control devices;
- Fugitive emissions control plans;
- Boiler tune-up reports; and
- Any calibration or quality assurance/quality control ("QA/QC") reports for parameter monitoring systems subject to subpart DDDD.

They explained that after the walkthrough, they would likely ask for additional records for review, such as parameter monitoring data.

4. Facility Walk-Through

At approximately 1:30 pm, the inspectors were escorted to the particleboard office by the representatives of Timber Products. There they were met by additional facility representatives, Mr. Niedermeyer, Mr. Wasniewski, and Mr. Brown. Mr. Niedermeyer and Mr. Wasniewski

provided a safety briefing, including site plans for the particleboard and plywood process buildings. The inspectors requested to be shown each step of the two manufacturing processes. They also requested that they be shown the pollution control equipment associated with each process.

a. Particleboard Manufacturing

The Timber Products representatives first showed the inspectors the particleboard manufacturing process. They led the inspectors along the production path, beginning where raw materials were received. See Photograph 2 in attached photo log. They then followed along the flow of the manufacturing process, including particle drying, milling, drawing, blending, pressing, sanding, cutting, optimizing, and finishing stages. The inspectors noted that, in the optimizing stage, pieces of particleboard were glued together, and they asked for a copy of the safety data sheets for any of the glues and any other additives used in the process, such as the material sprayed on the metal production plates to keep the particleboard from sticking during pressing.

Along the particleboard production path, the Timber Products representatives showed the inspectors the pollution control systems, including the cyclones, baghouses, and WESP. See Photographs 3 and 4 in photo log. The cyclones and baghouses are used to control PM from the milling and grinding, cutting, sanding, mixing, setup, and finishing of the particleboard. See Photographs 6, 12, and 13 in photo log. The WESP is used to control PM from the rotary particle dryer which burns natural gas and sawdust as fuel. See Photograph 1 in photo log. The inspectors did not conduct a formal visible emissions observation of the systems but did not observe any noticeable emissions from any of those control devices at that time.

The inspectors observed the facility's biofilter across from the WESP but noted that the duct work from the particle dryer exhaust had been disconnected. Timber Products personnel explained that although the alternative operating scenarios in paragraph 4 of the permit issued on June 23, 2022, referred to the biofilter as a possible control device, the ductwork from the WESP to the biofilter had been disconnected. See Photographs 5 and 7 in photo log. The facility representatives said that the ductwork could be reconnected if the biofilter was needed. They explained that the facility had previously used the biofilter to control VOCs, including HAPs, such as methanol and formaldehyde, from the fiber drying process but was now relying on the use of furnish with inlet moisture content of less than 30 percent (by weight, dry basis) to control those pollutants.

b. Plywood Manufacturing

The inspectors and Timber Products representatives then walked to the plywood production portion of the facility. The inspectors observed wood veneers being loaded and unloaded from trucks. Nearby, they observed the RTO that was located outside of the production building. See Photograph 8 in photo log. The inspectors did not conduct a formal visible emissions observation of the system but did not observe any noticeable emissions or odors from the device at that time.

The inspectors and Timber Products representatives proceeded to walk through the plywood production facility. Inside the plywood production building, they observed employees sorting and stacking veneers which were fed into the natural gas-fired veneer dryer which is ducted to

the RTO. They observed veneers exiting the veneer dryer that were then scanned, stacked, and repaired (if necessary). In some cases, veneers were formed from broken pieces glued together, i.e., composed, or knots and holes replaced with veneer plugs. They observed three layers of veneers being glued together then heated and pressed to form plywood.
The inspectors and Timber Representatives moved out of the building and into another building which housed the PW Boiler. See Photographs 9 and 10 in the photo log. The boiler produces steam used in the veneer pressing/plywood forming process.

The inspectors and Timber Products representatives returned to the main plywood production building where they observed sheets of plywood being cut, repaired (if defects), sanded, graded, and packaged for shipping. The inspectors did not conduct a formal visible emissions observation of the system but did not observe any noticeable emissions or odors from those processes at that time.

The inspectors and Timber representatives left the plywood manufacturing area and walked back to the area behind the particleboard buildings where they observed several cyclones and baghouses used to control PM from the sanding operations and mill hog chipper. See Photographs 11, 12, and 13. The inspectors did not conduct a formal visible emissions observation of the system but did not observe any noticeable emissions or odors from the devices at that time.

A digital photo log is Attachment 2 to this report.

The walkthrough ended at approximately 3:00 pm.

5. On-site Records Review:

At approximately 3:15 pm, the inspectors went back to the administration building to begin assembling and reviewing the records discussed earlier at the opening conference. The inspectors also asked to see records of the parameter monitoring conducted on the pollution control devices, such as the voltage and temperature from the WESP, the temperature readings from the RTO, and pressure drop readings from the baghouses. Ms. Basden provided the records from the WESP and RTO but explained that for the baghouses, the permit did not require operating parameters to be monitored so she did not provide pressure drop records. Rather, she explained that the permit required periodic visible emissions tests and provided records of visible emissions observations. The records indicated the dates and times of the visible emissions tests, as well as the name of the certified smoke reader who made the observations. She further explained that she submitted a monthly continuous parameter monitoring system ("CPMS") report to ODEQ for the temperature and voltage of the WESP and the temperature of the RTO and therefore, those reports were readily available.

The inspectors thanked Ms. Basden for collecting the records and explained that they would return to the facility to review them the following day.

At approximately 4:00 pm, the inspectors departed from facility.

6. Day 2 Inspection: Entry and Opening Conference

At approximately 8:00 am, the inspectors returned to the administration building of the facility. There they met with Ms. Basden, Mr. Feaster, Mr. Tally, and Mr. Arino (by phone). They explained the plan for the day was primarily to review the assembled records and then meet with Timber Products representatives to discuss any questions or areas of concern. However, they noted that they had not been shown the PB Boiler that provides 400-degree Fahrenheit ("F") steam to the particleboard press asked to see the boiler that morning.

7. Facility Walk-Through (continued from Day 1)

At approximately 10:00 am, the facility representatives escorted the inspectors to the boiler room in the plywood manufacturing building. See Photographs 15 and 16. At approximately 10:30 am, the inspectors returned to the conference room in the administration building.

8. Records Review (continued from Day 1):

The inspectors reviewed the records listed in Attachment 1. The following is a summary of the inspectors' observations of records reviewed that raised questions and/or concerns.

The inspectors reviewed the emissions test report, dated April 29, 2020, by Arctic Engineering. The test report appeared to indicate that the WESP and RTO exhaust had met their PM emission rate limitations during the testing. The test report also provides parameter operating data for the RTO, WESP, and plywood veneer dryer. The inspectors noted that on page 13, the emission factor verification testing result for non-methane volatile organic compounds ("NMVOC") was determined to be 0.738 pounds NMVOC per gross thousand square feet ("MSF") of particleboard on a three quarter ("¾") inch basis, which the report indicated was equivalent to 1.139 pounds NMVOC/bone dry ton ("BDT"). However, the report showed that the current emission factor used by the facility was 0.716 pounds NMVOC per gross MSF on a ¾ inch basis. Further, the inspectors reviewed the report entitled, "Title V Operating Permit Review Report," (application number 32207) for the permit issued in June 2022 which indicated that the proposed permit limit for VOC of 58 tons per year was based on an emission factor of 0.9 pounds VOC/BDT, from EPA's compilation of emission factors known as "AP-42", for the Particleboard Dryers 1 & 2. This indicates that the VOC/BDT emission factor used to develop the emission limit is more than 26% lower than the actual tested rate.

In reviewing the Title V annual report dated March 10, 2021, the inspectors observed that there were several permit conditions for which Timber Products reported intermittent compliance over the reporting period. However, upon closer inspection, they noted that the deviations were due to infrequent missed visible emissions readings (e.g., due to a worker injury), one missed thermocouple calibration, and infrequent instances of missing readings of one hour data.

The inspectors reviewed the monthly CPMS data reports for the 4th quarter of 2020, the 4th quarter of 2021, and the first 5 months of 2022. The reports showed that during most months there were at least one 3-hour period when the facility reported that the veneer dryer was "plugged up" forcing it to go offline. During that time, the temperature of the RTO was shown to be below the parameter limit of 1,375 degrees F. They also noted that there were periods when the reports indicated there were RTO equipment breakdowns that caused the temperature to drop

below the limit. These breakdowns did not appear to be frequent, i.e., not every month, and lasted for only a few hours. However, the inspectors noted that these temperature dips were not reported as deviations in the Title V semi-annual deviation reports.

At approximately 11:45 am, the inspectors left the facility for lunch.

9. Closing Conference

At approximately 12:25 pm, the inspectors returned to the facility.

At 12:30 pm, the inspectors met with Ms. Basden, Mr. Tally, and Mr. Feaster for a closing conference. During the closing conference, the inspectors explained that they had several potential compliance concerns but needed to ask a few clarifying questions.

First, the inspectors noted that the monthly CPMS reports indicated periods when the RTO temperature was reported as below 1,375 degrees F. They asked the Timber Products representatives about the facility's procedures when the veneer dryer was plugged with material. The representatives from Timber Products explained that periodically, pieces of veneer got caught in the dryer and it needed to be shutdown. When the dryer was shut down, the RTO was programmed to ramp down its temperature automatically. However, they explained that this was not a deviation because no veneer was fed into the dryer during such times.

The inspectors asked about the veneer dryer during the periods when the RTO experienced a malfunction. The Timber representations explained that similarly, the RTO was interlocked with the dryer and therefore, veneers could not be fed to the dryer if the RTO temperature went below the limit. In this way, they explained the lower temperature readings were not a deviation from the NESHAP parameter limit.

Second, the inspectors asked the facility representatives how the voltage meter used to monitor voltage of the WESP was calibrated under subpart DDDD, section 63.2269. They had reviewed the calibration records for the temperature sensors but not found any information regarding the voltage meters. The inspectors asked if there were any standard operating procedures or periodic service records that would indicate the sensors were calibrated. The facility representatives were not certain but believed that the voltage meter was calibrated during service of the WESP because the voltage meter was such a critical part if its operation. The inspectors indicated that calibration of all CPMS was required by the NESHAP and that the facility should determine how and when the voltage meter was serviced.

Third, the inspectors asked the facility representatives about the differences in between the AP-42 emission factor used to develop the VOC emission limit in the permit and the actual tested emission rate. The facility representatives said that they believed that the AP-42 factor was used in the permit application because the application was submitted prior to the March 2020 emissions testing. The inspectors indicated that this was an area of concern because the emission factor used was more than 26% lower than the actual tested rate and could lead to the facility exceeding its VOC limit at a lower number of operating hours than it believed it could operate and still comply with the permit limit.

The inspectors returned the paper reports and thanked the facility representatives for their time over the two days. No requests for follow up records were made. They explained that they would be submitting their report to EPA in the coming weeks and EPA would send them a copy of the report within the next 70 days. They also explained that EPA may contact them with follow up questions or actions, for example, if EPA had further questions regarding records.

The inspectors departed the facility at approximately 1:45 pm.

Attachment 1: List of Records Reviewed During CAA Inspection July 13 - 14, 2022

Request #	Request	Document Description	Document Date
1	NOCS	Notification of Compliance Status Subpart DDDD	4/13/2009
2	O&M Plans	Medford Baghouse and Filter Operating and Maintenance Procedures	6/1/2022
2	O&M Plans	Medford Continuous Monitoring Systems (CMS) Operating and Maintenance Procedures	5/30/2022
2	O&M Plans	Medford Particleboard Wet Electrostatic Precipitator (WESP) Operating and Maintenance Procedures	5/30/2022
2	O&M Plans	Medford Plywood Regenerative Thermal Oxidizer (RTO) SSM and Operating and Maintenance Procedures	5/31/2022
3	Emission Test Reports	Timber Products Co. Limited Partnership - Medford Plywood & Particleboard Facilities Compliance Source Test Report for Veneer Dryer (M1) / RTO-1 Exhaust Duct and Particleboard Rotary Dryers / WESP-1 Exhaust Duct	4/29/2020
4	VE testing Records last 6 months	Medford Particleboard Visible Emissions Observation Forms	10/26/2021
4	VE testing Records last 6 months	Visible Emission Observation Forms	6/6/2022
4	VE testing Records last 6 months	Timber Products Particleboard Visible Emission Observation Forms	7/8/2021
4	VE testing Records last 6 months	Medford Particleboard Visible Emissions Observation Forms	2/3/2022
4	VE testing Records last 6 months	Visible Emission Observation Forms	12/7/2021
4	VE testing Records last 6 months	Visible Emission Observation Forms	3/22/2022
4	VE testing Records last 6 months	Visible Emission Observation Forms	7/6/2021

4	VE testing Records last 6 months	Weekly Boundary Observation Forms	
5	ODS refrigerant records	General Air Products - Air cooled industrial chillers with Scroll compressors and R410A refrigerant - Cooling capacity 1.71 - 57.5 Tons	
6	Last year annual report and semiannual report	Annual Title V Report, Permit No. 15-0025-TV-01, Reporting Period January 1, 2021 to December 31, 2021	3/4/2022
6	Last year annual report and semiannual report	Boiler MACT Annual Compliance Report, Reporting Period: January 1 - December 31, 2021	1/24/2022
7	SSMP	Startup, shutdown, and malfunction plan	
8	Work orders for pollution control devices for last two years	Medford - History Work Orders (Closed & Canceled) - August 2018 to July 2022	7/13/2022
8	Work orders for pollution control devices for last two years	WESP - History Work Orders (Closed & Canceled) - August 2018 to July 2022	7/13/2022
8	Work orders for pollution control devices for last two years	RTO - Work Orders - May 2021 to June 2022	7/13/2022
9	Fugitives Control Plan	Fugitive Emissions Control Plan	5/31/2022
10	NESHAP 5D Tune up reports	Results for Themogenics Themocoil Natural Gas Fired Steam Boiler (PB Boiler) "Tune-Up", Determination of Carbon Monoxide (CO) and Oxygen (O2)	1/13/2022
10	NESHAP 5D Tune up reports	Results for Themogenics Themocoil Natural Gas Fired Steam Boiler (Boiler-1) "Tune-Up", Determination of Carbon Monoxide (CO) and Oxygen (O2)	1/13/2022
11	Facility Plot Plan	Medford Plywood Plantsite Evacuation Map	
11	Facility Plot Plan	Particleboard Evacuation Map	

12	Hot Melt Adhesive SDS	SDS: Pacific Adhesives HMG826 Hot Melt Adhesive	6/7/2019
13	Norwax SDS	SDS: Walker Emulsions Norwax® 526LS	10/10/2017
14	Isocyanate SDS	SDS: BASF Lupranate® M20 Isocyanate	10/19/2021
15	Release Agent SDS	SDS: Chem Trend® WC-8215W	12/9/2013
16	Urea Formaldehyde Resin SDS	SDS: Hexion Casco-Resin™ ULEF-600-05	2/16/2015
17	Monthly CPMS reports last six months	Medford Plywood Continuous Monitoring Report, Reporting Period 5/1/2022 to 5/31/2022	6/7/2022
17	Monthly CPMS reports last six months	Medford Plywood Continuous Monitoring Report, Reporting Period 4/1/2022 to 4/30/2022	5/11/2022
17	Monthly CPMS reports last six months	Medford Plywood Continuous Monitoring Report, Reporting Period 3/1/2022 to 3/31/2022	4/4/2022
17	Monthly CPMS reports last six months	Medford Plywood Continuous Monitoring Report, Reporting Period 2/1/2022 to 2/28/2022	3/10/2022
17	Monthly CPMS reports last six months	Medford Plywood Continuous Monitoring Report, Reporting Period 1/1/2022 to 1/31/2022	2/2/2022
17	Monthly CPMS reports last six months	Medford Particleboard Continuous Monitoring Report, Reporting Period 5/1/2022 to 5/31/2022	6/7/2022
17	Monthly CPMS reports last six months	Medford Particleboard Continuous Monitoring Report, Reporting Period 4/1/2022 to 4/30/2022	5/11/2022
17	Monthly CPMS reports last six months	Medford Particleboard Continuous Monitoring Report, Reporting Period 3/1/2022 to 3/31/2022	4/4/2022
17	Monthly CPMS reports last six months	Medford Particleboard Continuous Monitoring Report, Reporting Period 2/1/2022 to 2/28/2022	3/9/2022
17	Monthly CPMS reports last six months	Medford Particleboard Continuous Monitoring Report,	2/7/2022

		Reporting Period 1/1/2022 to 1/31/2022	
18	Semiannual CPMS QA/QC records for last two years	Semi Annual Calibration Forms - Moisture Meters and Thermocouples	
19	Monthly CPMS reports for Oct - Dec 2020 and Oct - Dec 2021	Medford Particleboard Continuous Monitoring Report, Reporting Period 10/1/2020 to 10/31/2020	11/3/2020
19	Monthly CPMS reports for Oct - Dec 2020 and Oct - Dec 2021	Medford Particleboard Continuous Monitoring Report, Reporting Period 11/1/2020 to 11/30/2020	12/3/2020
19	Monthly CPMS reports for Oct - Dec 2020 and Oct - Dec 2021	Medford Particleboard Continuous Monitoring Report, Reporting Period 12/1/2020 to 12/31/2020	1/5/2021
19	Monthly CPMS reports for Oct - Dec 2020 and Oct - Dec 2021	Medford Plywood Continuous Monitoring Report, Reporting Period 10/1/2020 to 10/31/2020	11/4/2020
19	Monthly CPMS reports for Oct - Dec 2020 and Oct - Dec 2021	Medford Plywood Continuous Monitoring Report, Reporting Period 11/1/2020 to 11/30/2020	12/3/2020
19	Monthly CPMS reports for Oct - Dec 2020 and Oct - Dec 2021	Medford Plywood Continuous Monitoring Report, Reporting Period 12/1/2020 to 12/31/2020	1/5/2021
19	Monthly CPMS reports for Oct - Dec 2020 and Oct - Dec 2021	Medford Particleboard Continuous Monitoring Report, Reporting Period 10/1/2021 to 10/31/2021	11/4/2021
19	Monthly CPMS reports for Oct - Dec 2020 and Oct - Dec 2021	Medford Particleboard Continuous Monitoring Report, Reporting Period 11/1/2021 to 11/30/2021	12/7/2021
19	Monthly CPMS reports for Oct - Dec 2020 and Oct - Dec 2021	Medford Particleboard Continuous Monitoring Report, Reporting Period 12/1/2021 to 12/31/2021	1/6/2022
19	Monthly CPMS reports for Oct - Dec 2020 and Oct - Dec 2021	Medford Plywood Continuous Monitoring Report, Reporting Period 10/1/2021 to 10/31/2021	11/2/2021

19	Monthly CPMS reports for Oct - Dec 2020 and Oct - Dec 2021	Medford Plywood Continuous Monitoring Report, Reporting Period 11/1/2021 to 11/30/2021	12/7/2021
19	Monthly CPMS reports for Oct - Dec 2020 and Oct - Dec 2021	Medford Plywood Continuous Monitoring Report, Reporting Period 12/1/2021 to 12/31/2021	1/6/2022
Additionally, the inspectors reviewed electronically available records, including but not limited to:			
	Title V Permit	Oregon Title V Operating Permit, Permit number: 15-0025-TV-0 I, dated June 23, 2022	6/23/2022
	Title V Permit	Oregon Title V Operating Permit, Permit number: 15-0025-TV-0 I, dated May 12, 2016	5/12/2016
	Permit Review Report	Title V Operating Permit Review Report for application number 32207	2019
	Minor Permit Modification	Title V Operating Permit Minor Permit Modification, dated August 5, 2019	8/5/2019
	Construction Permit	Oregon Department of Environmental Quality Construction Air Contaminant Discharge Permit, dated June 21, 2021	6/21/2021
	Annual Title V Report	Annual Title V Report, Permit No. 15-0025-TV-01, Reporting Period January 1, 2020 to December 31, 2020, dated March 10, 2021	3/10/2021
	Semiannual Title V Report	Semiannual Title V Report, Permit No. 15-0025-TV-01, Reporting Period January 1, 2021 to June 30, 2021, dated June 26, 2021	6/26/2021
		Annual Title V Report, Permit No. 15-0025, for 2016, dated January 30, 2017, including the semi-annual certification and semi-annual MACT compliance reports	1/30/2017

	Air Toxics Emissions Inventory	The 2016 Air Toxics Emissions Inventory for the facility	4/17/2020
	Source Test Report	Particle Dryers, Particleboard Press, Biofilter Source Test Results from November 2008 to October 2014	unknown
	Administrative Permit Amendments	Various administrative amendments to the permit between 2019 and 2021	various 2019 - 2021

Attachment 2: Timber Products CAA Inspection Report Photo Log